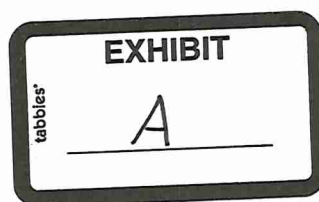


I, Laura Barmore, Deputy Clerk of Court for the Third Judicial District Court for Lincoln Parish, Louisiana, hereby certify and attest that the attached, consisting of a total of five (5) pages, constitutes a true, correct and complete copy of the entire court record filed in this Court captioned *Aleah Robinson v. D Benton, Inc., Progressive Casualty Insurance Company and Gordan Ferrell, Jr.*, Docket No. 62,160;

SO CERTIFIED AND ATTESTED TO this 18 day of February, 2022,
at Ruston, Louisiana.

Laura Barmore
DEPUTY CLERK OF COURT
THIRD JUDICIAL DISTRICT COURT
LINCOLN PARISH, LOUISIANA



ALEAH ROBINSON : SUIT NUMBER 62160
VERSUS : 3rd JUDICIAL DISTRICT COURT
D BENTON, INC.; PROGRESSIVE : LINCOLN PARISH, LOUISIANA
CASUALTY INSURANCE COMPANY and
GORDAN FERRELL, JR.

PETITION

Aleah Robinson, of the full age of majority and domiciled in Lincoln Parish, Louisiana, respectfully represents:

1.

The defendants making this petition necessary are:

- a. D Benton Inc., a foreign corporation whose principal place of business is in the State of North Carolina;
- b. Progressive Casualty Insurance Company, a foreign insurer who provided liability coverage to D Benton, Inc.; and
- c. Gordan Ferrell, Jr., of full age of majority, domiciled in Durham County, North Carolina.

2.

On December 17, 2021, a wreck occurred on I-20 in Lincoln Parish, Louisiana, involving a tractor trailer, owned by D Benton, Inc., and operated by Gordan Ferrell, Jr., and a 2014 Ford Fusion operated by Aleah Robinson.

3.

Gordan Ferrell, Jr. rear-ended Aleah Robinson.

4.

Gordan Ferrell, Jr., endangered the public and caused plaintiff harm by:

- a. Failing to maintain a proper lookout;
- b. Following too close; and
- c. Operating his vehicle in a careless and reckless manner.

5.

Gordan Ferrell, Jr., was in the course and scope of his employment with D Benton Inc., at all times relevant herein.

A True Copy of the Original on File
This February 18, 2022
Laura Barron
Dy. Clerk, District Court

Filed in Clerk's Office
JAN 26 2022 20
[Signature]
E.Y. C.D.C.

6.

Defendants' reckless and negligent conduct caused harm to plaintiff, Aleah Robinson. Defendants are responsible for plaintiff's past, present, and future: 1) medical expenses; 2) pain and suffering; 3) mental pain and anguish; 4) functional limitations and impairments; 5) scarring and disfigurement; 6) lost wages and economic loss; 7) loss of enjoyment of life; and 8) property damage; and 9) loss of earning capacity.

7.

Plaintiffs' claims equal or exceed the amount in controversy required for jurisdiction under 28 USC Code §1332.

WHEREFORE, plaintiffs pray that all harms and losses caused by the defendants be repaired by judgment.

PLEASE SERVE:

D BENTON, INC.

Through their agent for service of process

Gregory Dale Benton
1588 Cuyler Best Rd.
Goldsboro, NC 27534

**PROGRESSIVE CASUALTY
INSURANCE COMPANY**

Through their agent for service of process

Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 700809

GORDAN FERRELL, JR.

2727 Little Rogers Rd.
Duram, NC 27704

MORRIS & DEWETT, LLC

By: 

Meghan M. Nolen (#39522)
509 Milam Street
Shreveport, LA 71101
(318) 221-1507 – Telephone
(318) 221-4560 – Facsimile
mnolen@morrisdewett.com

ATTORNEY FOR PLAINTIFFS

ATTORNEY: MEGHAN M NOLEN

D863506

CITATION

ALEAH ROBINSON	THIRD JUDICIAL DISTRICT
VS.	PARISH OF LINCOLN
D BENTON INC, ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-62160	

TO: PROGRESSIVE CASUALTY INSURANCE COMPANY
THROUGH THEIR AGENT FOR SERVICE OF PROCESS
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
BATON ROUGE, LA
70809

YOU ARE HEREBY CITED to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). Alternatively, you should file an answer or other pleading to said petition in the office of the Clerk of the Third Judicial District Court, in the Lincoln Parish Courthouse Ruston, Louisiana, within TWENTY-ONE (21) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

WITNESS THE HONORABLE JUDGES of said Court, this JANUARY 26, 2022.

LINDA COOK, CLERK OF COURT

By: _____
Deputy Clerk of Court
Lincoln Parish

ATTACHMENTS
PETITION

SHERIFF’S RETURN

DATE: _____ 20____
SERVED: _____
PERSONAL () _____
DOMICILIARY () _____
UNABLE TO LOCATE MOVED () NO SUCH ADDRESS ()
OTHER REASON: _____
RECEIVED TO LATE FOR SERVICE ()
SERVICE OF WITHIN PAPERS
COST FOR FEE: \$ _____ MILEAGE: \$ _____ TOTAL: \$ _____
DEPUTY: _____

ATTORNEY: MEGHAN M NOLEN

D863514

CITATION (LONG-ARM)

ALEAH ROBINSON	THIRD JUDICIAL DISTRICT
VS.	PARISH OF LINCOLN
D BENTON INC, ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-62160	

TO: D BENTON INC
THROUGH THEIR AGENT FOR SERVICE OF PROCESS
GREGORY DALE BENTON
1588 CUYLER BEST RD
GOLDSBORO, NC 27534

****VIA LA LONG ARM STATUTE****

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). Alternatively, you should file an answer or other pleading to said petition in the office of the Clerk of the Third Judicial District court, Ruston, Louisiana, within thirty (30) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this JANUARY 26, 2022.

LINDA COOK, CLERK OF COURT

By: _____
Deputy Clerk of Court
Lincoln Parish

ATTACHMENTS
PETITION

SHERIFF’S RETURN

DATE: _____ 20____
SERVED: _____
PERSONAL () _____
DOMICILIARY () _____
UNABLE TO LOCATE MOVED () NO SUCH ADDRESS ()
OTHER REASON: _____
RECEIVED TO LATE FOR SERVICE ()
SERVICE OF WITHIN PAPERS
COST FOR FEE: \$ _____ MILEAGE: \$ _____ TOTAL: \$ _____

DEPUTY: _____

ATTORNEY: MEGHAN M NOLEN

D863522

CITATION (LONG-ARM)

ALEAH ROBINSON	THIRD JUDICIAL DISTRICT
VS.	PARISH OF LINCOLN
D BENTON INC, ET AL	STATE OF LOUISIANA
DOCKET NUMBER: C-62160	

TO: GORDON FERRELL JR
2727 LITTLE ROGERS RD
DURAM, NC 27704

****VIA LA LONG ARM STATUTE****

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). Alternatively, you should file an answer or other pleading to said petition in the office of the Clerk of the Third Judicial District court, Ruston, Louisiana, within thirty (30) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

Witness the Honorable Judges of said Court, this JANUARY 26, 2022.

LINDA COOK, CLERK OF COURT

By: _____
Deputy Clerk of Court
Lincoln Parish

ATTACHMENTS
PETITION

SHERIFF’S RETURN

DATE: _____ 20____
SERVED: _____
PERSONAL () _____
DOMICILIARY () _____
UNABLE TO LOCATE MOVED () NO SUCH ADDRESS ()
OTHER REASON: _____
RECEIVED TO LATE FOR SERVICE ()
SERVICE OF WITHIN PAPERS
COST FOR FEE: \$ _____ MILEAGE: \$ _____ TOTAL: \$ _____
DEPUTY: _____